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May 5, 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, Maryland 20852

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

I am writing in strong support of requiring that irradiated foods be clearly and correctly labeled. FDA must not abrogate its responsibility to inform U.S. consumers and must allow consumers to get basic information about the food products they purchase, such as how a product has been treated and processed.

One of the basic tenets of a free market is an informed consumer. If a food product does not have a label indicating it was irradiated, consumers will be misled into believing the food has not been irradiated. If the FDA does not require labeling, leading to misinformation in the marketplace, the FDA will be acting counter to all concepts of consumer information and consumer rights.

I support the recommendation by the Center for Science in the Public Interest:

"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. It would be misleading and inaccurate to allow any phrase involving the word "pasteurization" to be used in place of the terms "radiation" or "irradiation" because consumers know of pasteurization as an entirely different process.

The requirement for irradiation disclosure (both label and radura) should not be allowed or permitted to expire. Consumers have the right to know how the food they purchase has been

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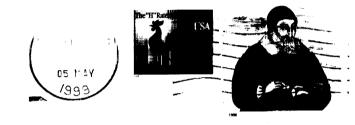
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grown, treated and processed; this right exists now and will and should exist into the future. Even if some consumers become familiar with the radura, new consumers (e.g., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone.

Sincerely,

Carol Stroebel





John Foster | 1648-1681 | 32 USA

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